

2-4-10 10:00 am

IN THE DISTRICT COURT OF OTTAWA COUNTY
STATE OF OKLAHOMA

FILED
DISTRICT COURT
OTTAWA CO. OKLA.

FIRST CHRISTIAN CHURCH OF MIAMI,

)

DEC 27 2010

Plaintiff,

)

CASSIE KEY COURT CLERK

v.

)

BY _____
Case No. CJ-2010-57

ARGONAUT GREAT CENTRAL INSURANCE
COMPANY and FORD ENGINEERING,

)

Defendants.

)

MOTION TO COMPEL

COMES NOW the Defendant, Argonaut Great Central Insurance Company, and pursuant to 12 O.S. §3237, move this Court for an Order requiring Plaintiff, First Christian Church of Miami, to fully answer Interrogatories and Requests for Production served on Plaintiff in this action within ten days from the date of such Order.

Defendant served Plaintiff with Interrogatories and Request for Production on or about October 14, 2010. See attached Exhibit "A". Plaintiff recently provided many documents, only a handful of which were responsive to our Requests and a key deposition of Plaintiff's primary witness, Pastor Leon Weece, has been stricken and rescheduled on multiple occasions due to Plaintiff's failure to provide discovery responses. The Defendant has, in good faith, conferred with counsel for Plaintiff in an effort to secure the information sought in these discovery responses without Court action. However, such efforts have been unsuccessful. The items requested are not meant for purposes of harassment or delay, but in fact are necessary to conduct meaningful discovery. It is imperative that Defendants receive these answers.

WHEREFORE, Defendant, Argonaut Great Central Insurance Company, respectfully request that this Court enter an Order compelling Plaintiff to fully respond to Defendant's discovery

requests within 10 days of such Order and further awarding Defendant its costs of this motion, including a reasonable attorneys' fee, pursuant to 12 O.S. §3237, and such other and further relief as this Court deems just and equitable.

STEWART LAW FIRM

By:

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CERTIFICATE OF MAILING

This is to certify that on this 22nd day of December, 2010, a true and correct copy of the above and foregoing was mailed, postage prepaid, to the following named counsel of record, to-wit:

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